

PL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

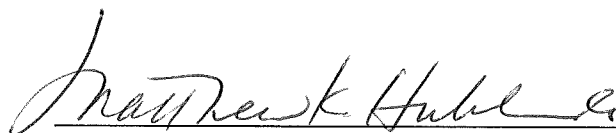
NICHOLAS VERNACCHIO,	:	CIVIL ACTION
Plaintiff,	:	
	:	
v.	:	
	:	
CITY OF PHILADELPHIA, ET AL.,	:	NO. 11-CV-0370 (LDD)
Defendants.	:	

OFFER OF JUDGMENT

TO: Susan B. Ayres, Esquire
Anthony Lopresti, Esquire
HILL & ASSOCIATES, PC
123 South Broad Street, Suite 1100
Philadelphia, PA 19109
(215) 525-4312 (fax)

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, the defendants, City of Philadelphia and Police Officer Mario Bocelli, by and through their attorney, Matthew Kevin Hubbard, Divisional Deputy City Solicitor, hereby offer to allow Judgment to be taken against them and in favor of the plaintiff for all claims for damages, costs, attorneys' fees and interest accrued to date, in the amount of **FORTY THOUSAND U. S. DOLLARS (\$40,000.00)**.

This Offer of Judgment is made solely for the purposes specified in Federal Rule of Civil Procedure 68 and is not to be construed either as an admission that the defendants are liable in this action, or that the plaintiff has suffered any damages. Said judgment is to have no effect whatsoever except in settlement of this case. Additionally, this Offer of Judgment is not admissible as evidence in any proceeding, except, if rejected, in a proceeding to determine costs. If this Offer of Judgment is not accepted in writing within fourteen (14) days, it shall be deemed withdrawn.

A handwritten signature in black ink, reading "Matthew Kevin Hubbard", written over a horizontal line.

Matthew Kevin Hubbard
Divisional Deputy City Solicitor
Attorney Identification #44110
City of Philadelphia Law Dept.
1515 Arch Street, 14th Floor
Philadelphia, PA 19102
(215) 683-5439 (direct dial)
(215) 683-5397 (fax)

Dated: October 7, 2011



123 S. Broad St., Suite 1100
Philadelphia, PA 19109
+ 1 215 567 7600 Main
+ 1 215 525 4453 Fax

October 18, 2011

Via Facsimile 215-683-5397

Matthew K. Hubbard, Esquire
City of Philadelphia Law Department
1515 Arch Street
14th Floor – Civil Rights Unit
Philadelphia, PA 19103

**RE: NICHOLAS VERNACCHIO V. CITY OF PHILADELPHIA, ET AL.
U.S.D.C., NO. 11-0370**

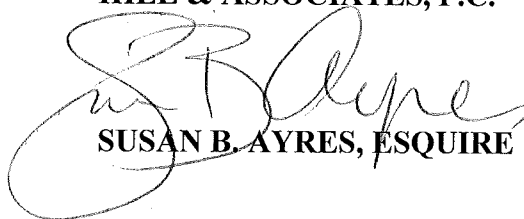
Dear Mr. Hubbard:

With regard to the above referenced matter, Plaintiff hereby accepts the \$40,000.00 Offer of Judgment. Kindly remit payment of same within thirty (30) days.

We will be filing our acceptance with the Court shortly.

Sincerely,

HILL & ASSOCIATES, P.C.

A handwritten signature in cursive script, appearing to read "S. B. Ayres", is written over the typed name.

SUSAN B. AYRES, ESQUIRE

SBA/cz

cc: Craig Straw, Esquire (via fax 215-683-5397)